UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SF-BAU Ploiesti S.R.L.,

Plaintiff,

No. 04-11806 (WGY)

v.

Raytheon Engineers & Constructors International, Inc.,

Defendant.

ASSENTED-TO MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITION TO CONFIRM FOREIGN ARBITRAL AWARD

Defendant Raytheon Engineers & Constructors International, Inc. ("RECI"), hereby moves pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an extension of time to September 23, 2004, to respond to the plaintiff's Petition to Confirm Foreign Arbitral Award (the "Petition"). In support of this assented-to motion, RECI states:

- 1. Additional time is needed to respond to the extensive allegations contained in the Petition;
 - 2. Plaintiff has assented to the motion; and
 - 3. There will be no prejudice to any other party from the granting of this extension.

WHEREFORE, defendant Raytheon Engineers and Constructors International, Inc., respectfully requests that the Court extend to September 23, 2004, the due date for its response to Plaintiff's Petition to Confirm Foreign Arbitral Award.

Respectfully Submitted,

Raytheon Engineers and Constructors International, Inc.,
By its attorneys,

/s/ Paul M. Robertson
Paul M. Robertson, BBO # 562421
BINGHAM McCUTCHEN LLP
150 Federal Street
Boston, MA. 02110-1726
Tel. (617) 951-8000
Fax. (617) 951-8736
paul.robertson@bingham.com

Paul J. Lambert, BBO # 283880 **BINGHAM McCUTCHEN LLP** Suite 800, 1120 20th Street, N.W. Washington, D.C. 20036 Tel. (202) 778-3183 Fax. (202) 778-6155

Dated: September 8, 2004

Assented to by:

SF-BAU Ploiesti S.R.L. By its attorneys,

/s/ Dennis M. Lindgren
James D. Masterman, BBO # 324000
Dennis M. Lindgren, BBO # 648007
Masterman, Culbert & Tully LLP
One Lewis Wharf
Boston, MA 02110
Tel. (617) 227-8010

Case 1:04-cv-11806-JLT Document 6 Filed 09/08/2004 Page 3 of 3

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorneys of record for all parties by electronic and/or US mail on September 8, 2004.

/s/ Paul M. Robertson Paul M. Robertson